

1 ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
2 TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
9120 West Post Road, Suite 100  
4 Las Vegas, Nevada 89148  
(702) 254-7775  
5 (702) 228-7719 (facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
6 *Attorney for Defendants*  
THUNDER PROPERTIES, INC.  
7 AND LVDG, LLC [SERIES 109]

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 \*\*\*

11 BANK OF AMERICA, N.A., )

12 )  
13 Plaintiff, )

14 vs. )

15 CASOLEIL HOMEOWNERS ASSOCIATION; )  
16 LVDG, LLC d/b/a LVDG SERIES 109; )  
THUNDER PROPERTIES, INC.; and ALESSI )  
& KOENIG, LLC, )

17 Defendants. )  
18 )

Case No. 3:16-cv-00307-MMD-WGC

19 **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE**  
20 **RELATED TO MOTION FOR SUMMARY JUDGMENT**  
21 **(First Request)**

22 COMES NOW Plaintiff, BANK OF AMERICA, N.A., and Defendants, THUNDER  
23 PROPERTIES, INC. and LVDG, LLC [SERIES 109], by and through their undersigned counsel,  
24 and hereby stipulate and agree as follows:

- 25 1. On November 30, 2017, Plaintiff filed a Motion for Summary Judgment herein  
26 [ECF #55]. Responses are presently due on December 21, 2017.
- 27 2. Defendants' counsel has been required to devote time and attention to numerous  
28 other pending legal matters since the filing of the Motion for Summary Judgment  
which have detracted from the time available prepare a response. Specifically,

Defendants' counsel has responded to approximately 15-20 summary judgment motions that have been filed in various cases over the course of the past several weeks. In addition, Defendants' counsel has had several appellate briefs due within the past several weeks and coming weeks.

3. Based upon the foregoing, Defendants have requested and shall be granted an extension of time until January 26, 2018, in which to respond to the Plaintiff's Motion for Summary Judgment.

4. For reasons similar to those set forth above, Plaintiff desires an extension of time in which to file any Reply to Defendants' Response. To that end, Plaintiff has requested and shall be granted an extension of time until February 16, 2018, in which to file its Reply to Defendants' Response to Motion for Summary Judgment.

5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 20<sup>th</sup> day of December, 2017.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

AKERMAN, LLP

/s/ Timothy E. Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Defendant  
Thunder Properties, Inc.  
and LVDG, LLC [Series 109]*

/s/ Karen A. Whelan  
KAREN A. WHELAN, ESQ.  
Nevada Bar No. 10466  
1160 N. Town Center Drive, Suite 330  
Las Vegas, NV 89144  
(702) 634-5005  
[jamie.combs@akerman.com](mailto:jamie.combs@akerman.com)  
*Attorney for Plaintiff  
Bank of America, N.A.*

IT IS SO ORDERED.

By:   
Judge, U.S. District Court

Dated: December 20, 2017

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of December, 2017, I served via the United States District Court CM/ECF electronic filing system, the foregoing

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT (First Request)** to the following parties:

Rebekkah B Bodoff  
Akerman  
1160 Town Center Drive  
Suite 330  
Las Vegas, NV 89144  
702-634-5039  
[rebekkah.bodoff@akerman.com](mailto:rebekkah.bodoff@akerman.com)  
*Attorney for Plaintiff*  
*US Bank National Association*

Thera A Cooper  
Akerman LLP  
1160 Town Center Drive  
Las Vegas, NV 89144  
702-634-5000 x5041  
[Thera.cooper@akerman.com](mailto:Thera.cooper@akerman.com)  
*Attorney for Plaintiff*  
*US Bank National Association*

Christine M. Parvan  
Akerman LLP  
1160 Town Center Drive  
Suite 330  
Las Vegas, NV 89144  
702-634-5000  
702-380-8572 (fax)  
[christine.parvan@akerman.com](mailto:christine.parvan@akerman.com)  
*Attorney for Plaintiff*  
*US Bank National Association*

Ariel E. Stern  
Akerman LLP  
1160 Town Center Drive  
Suite 330  
Las Vegas, NV 89144  
702-634-5000  
702-380-8572 (fax)  
[ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)  
*Attorney for Plaintiff*  
*US Bank National Association*

Donna M. Wittig  
Akerman LLP  
1600 Town Center Drive, Suite 330  
Las Vegas, NV 89144  
(702) 634-5000  
[donna.wittig@akerman.com](mailto:donna.wittig@akerman.com)  
*Attorney for Plaintiff*  
*US Bank National Association*

Jeanette E. McPherson  
Schwartz & McPherson Law Firm  
2850 South Jones Boulevard  
Suite 1100  
Las Vegas, NV 89146  
702-228-7590  
702-892-0122 (fax)  
[bkfilings@s-mlaw.com](mailto:bkfilings@s-mlaw.com)  
*Attorney for Chapter 7 Trustee*  
*Shelley D. Krohn*

Sean L. Anderson  
Leach Johnson Song & Gruchow  
8945 W. Russell Road, Ste. 330  
Las Vegas, NV 891148  
(702) 538-9074  
(702) 538-9113 (fax)  
[sanderson@leachjohnson.com](mailto:sanderson@leachjohnson.com)  
*Attorney for Defendant*  
*Casoleil Homeowners Association*

Ryan Warren Reed  
Leach Johnson Song & Gruchow  
8945 W. Russell Rd., Ste. 330  
Las Vegas, NV 891148  
702-538-9074  
702-538-9113 (fax)  
[rreed@leachjohnson.com](mailto:rreed@leachjohnson.com)  
*Attorney for Defendant*  
*Casoleil Homeowners Association*

/s/ Timothy E. Rhoda

An employee of ROGER P. CROTEAU &  
ASSOCIATES, LTD.